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December 2, 2024

**VIA ECF**

Honorable Justin T. Quinn, U.S.M.J.  
United States District Court, District of New Jersey  
402 East State Street  
Trenton, New Jersey 08608

Re: Goydos, et al. vs. Rutgers, The State University of New Jersey  
Civil Action No. 3:19-cv-08966-RAK-JTQ

Dear Judge Quinn:

This Firm represents Defendant, Rutgers, The State University of New Jersey ("Rutgers"), in this action. With the consent of Plaintiffs' counsel, Shaun I. Blick, Esq., and Kara A. Findel, Esq., we respectfully submit this joint status letter pursuant to Your Honor's September 5, 2024 text Order (ECF Doc. 148).

The parties are engaged in discovery, including conducting depositions. To date, both Plaintiffs have appeared for the first day of their depositions, which will have to be continued after additional discovery materials are produced by Plaintiffs.

Plaintiffs have conducted the depositions of two (2) fact witnesses, Detective Paul Kelley of the Middlesex County Prosecutor's Office, and William F. Maderer, Esq., of Saiber LLC. Plaintiffs' depositions of four (4) additional fact witnesses, DanaLynn Colao, Esq., of Saiber LLC, Lee Vartan, Esq., of Chiesa, Shahinian & Giantomasi, PC, Michelle Coppola (Bolognini), former Rutgers Police Department detective, and Alyssa Gambarella, Esq., former Middlesex County Assistant Prosecutor, are scheduled for dates between December 5, 2024, and January 10, 2025.

Rutgers' deposition of Plaintiff Dr. Goydos and Plaintiffs' deposition of Mr. Maderer have made it clear that Rutgers will have to take the deposition of Plaintiffs' counsel, Shaun I. Blick, Esq., as a fact witness. Notwithstanding, Plaintiffs will be objecting to the deposition of Mr. Blick.

In addition, Rutgers has requested that Plaintiffs provide outstanding documents and other discovery materials, including executed authorizations for Plaintiffs' relevant medical, employment, and third-party agency records.



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The parties have also submitted a joint letter regarding Plaintiffs' request for the Court to compel additional written discovery from Rutgers (ECF Doc. 151). The Court has scheduled a telephone conference for December 5, 2024 (ECF Doc. 152).

We thank the Court for its consideration.

Respectfully submitted,

JACKSON LEWIS P.C.

A handwritten signature in black ink, appearing to read "John K. Bennett", written over the printed name.

John K. Bennett

Cc: Shaun I. Blick, Esq. (By ECF)  
Kara A. Findel, Esq. (By ECF)